



The Library of Virginia presents

Virginia Public Records Management Manual

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LIBRARY OF VIRGINIA

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CHAPTER 1: **BASICS OF A RECORDS MANAGEMENT PROGRAM**

The Virginia Public Records Act (VPRA) § 42.1-76 et seq. “...establishes a single body of law applicable to all public officers and employees to ensure that the procedures used to manage and preserve public records will be uniform throughout the commonwealth.”

A public records management program is implemented in order to:

- Aid and assist custodians of public records in making informed judgments about policy.
- Enable citizens to judge the conduct of the government by providing administrative, fiscal, and legal accountability.
- Allow information to be open for observation and access, while safeguarding privacy and confidentiality.
- Ensure the documentation of government actions.
- Maintain good business practices.

In addition to being a mandate of the *Code of Virginia*, following sound records management practices is good business. Public officials are legally responsible for creating and maintaining records that document the transactions of government. These records provide evidence of the operations of government and accountability to its citizens. Public officials must maintain this information according to established records retention and disposition schedules regardless of record format. The content of a document determines whether it is a public record and how it is to be retained.

Records Management Objectives

Records management is the economical and effective administrative process for managing information and ensuring access throughout its life cycle, from creation to destruction or preservation.

To create and maintain an effective records management program, each government entity must:

- Designate at least one records officer through submission of the [Records Officer Designation and Responsibilities \(RM-25 Form\)](#).
- Develop [policies and procedures](#) for records management.
- Conduct a survey or inventory of records in all formats.
- Establish and follow Library of Virginia–approved records retention and disposition schedules.
- Use technology, as appropriate, to create, store, and retrieve records.
- Destroy records at the end of their retention period and document that destruction.
- Store inactive records in a cost-effective and secure location.
- Identify and protect essential records.
- Identify and preserve permanent records.
- Develop a records emergency response plan to protect and recover all records.
- Implement filing and indexing systems.

Benefits

An effective records management program will:

- Reduce the volume of records stored by destroying records that have reached the end of their retention.
- Increase the efficiency of office operations through better storage and retrieval systems.
- Reduce costs for equipment, supplies, space, and personnel.
- Identify and protect essential records.

- Improve accountability of public funds.
- Reduce liability risks by keeping records according to retention schedules.

What Is a Public Record?

The VPRA defines a public record as:

“...information that documents a transaction or activity by or with any public officer, agency or employee of an agency. Regardless of physical form or characteristic, the recorded information is a public record if it is produced, collected, received or retained in pursuance of law or in connection with the transaction of public business. The medium upon which such information is recorded has no bearing on the determination of whether the recording is a public record.” *Code of Virginia § 42.1-77*

Public records, except for those exempt under the Virginia Freedom of Information Act (FOIA), must be available for access throughout their retention periods per *Code of Virginia § 2.2-3700 et seq.* A record that is considered FOIA-exempt is not exempt from the requirements of the VPRA. Records containing confidential information are still public records.

Designating a Records Officer

The VPRA § 42.1-85 states that each agency and political subdivision “shall designate as many as appropriate, but at least one, records officer to serve as a liaison to the Library of Virginia for the purposes of implementing and overseeing a records management program, and coordinating legal disposition, including destruction of obsolete records.”

For the purposes of this manual, “political subdivision” and “locality” shall mean the same, and include all local government entities, regional authorities, and political subdivisions within the Commonwealth of Virginia.

The designated records officer (RO) should have the support of senior/executive management and should retain a position of influence within the agency or locality. The duties of the RO will require a substantial time commitment. Carefully consider the following points when appointing an RO.

The employee designated as RO must have the time and the ability to:

- Manage an agency-wide records management program to include the storage, retrieval, retention, and disposition of public records.
- Create agency-specific procedures that provide direction on complying with these mandated records management functions.
- Provide training to, and routinely educate, staff on these procedures.
- Identify essential and archival records and ensure that those records are properly maintained, protected, and accessible.
- Coordinate the development of a records emergency response plan for the protection/recovery of records in the event of a disaster.
- Work with departments, including Information Technology, to identify and implement electronic records solutions and participate in decisions concerning records reformatting.

- Conduct records audits to ensure compliance with Library of Virginia–approved records retention and disposition schedules and agency procedures.

These responsibilities must be clearly outlined and reflected in the records officer’s job description or employee work profile. A minimum of 20 percent of the records officer’s time, or eight hours a week, should be dedicated to fulfilling these responsibilities.

Designate the person or persons who will serve as records officer(s) by mailing the [Records Officer Designation and Responsibilities \(RM-25 Form\)](#) to the Library.

Starting and Maintaining a Successful Records Management Program

Follow these steps to establish and maintain a successful records management program:

1. Identify the person(s) who will serve as records officer (RO) and lead the records management program. Complete the [Records Officer Designation and Responsibilities \(RM-25 Form\)](#) and submit it to the Records Analysis Section (RAS) at the Library of Virginia. Have senior management display support by announcing this appointment to all staff. Management should send a clear message that cooperation and compliance are expected from everyone.

Selecting records coordinators may be helpful for larger agencies or localities. These coordinators act as liaisons to divisions within the organization and aid the RO. If the coordinator will enter boxes into Infolinx for storage at the State Records Center, then an RM-25 must be submitted formally designating that person as a records coordinator. Otherwise, no RM-25 should be submitted for a coordinator.

2. Develop records management policies and procedures specific to the organization and disseminate to staff along with references to online Library-approved retention schedules. Adherence to internal policies and procedures will create accountability, credibility, and consistency within a records management program. To aid ROs with this task, the Library provides information on [creating records management policy and procedures](#). Included are a policy template and guidance for developing procedures.
3. Regularly disseminate records management education information to staff, including Library-produced training tools and internal procedural guidance. It is the responsibility of the RO to educate and train fellow employees. The Library provides a variety of training and education tools on the [Records Management website](#), including [tip sheets](#) on topics such as social media, records destruction, and how to use the [Virginia Records Officer Listserv \(VA-ROL\)](#). Also available are [Digital Imaging Guidelines](#), [E-Mail Management Guidelines](#), and [Electronic Records Guidelines](#). The Library also maintains a [YouTube channel](#) devoted to training videos on topics such as the Virginia Public Records Act, transferring archival records, and filling out the Certificate of Records Destruction (RM-3 Form). It is the RO’s responsibility to create and implement internal policies and procedures that supplement resources created by the Library and to disseminate the most up-to-date records management information to appropriate staff. It’s not enough to train staff once or send out new information as it is posted by the Library. Education is a records officer’s ongoing responsibility.
4. Create and distribute a disaster/emergency plan for protecting and preserving records. The Library provides access to the [Intergovernmental Preparedness for Essential Records \(IPER\) Project](#). The IPER coursework is designed to help prepare state and local governments to protect records before, during, and after disasters and other emergencies and aid in the creation of a response plan.

5. Conduct an annual review of retention schedules and the records management program, including a disaster/emergency plan critique. If necessary, contact the Records Analysis Section to update retention schedules or transfer records to the State Records Center or Archives.

Library of Virginia analysts are available to travel and provide records management training to agencies or localities with a minimum of 30 participants signed up in advance. Contact RAS for more information about on-site training.

Delivery of Records to Successor

At the end of a records custodian's term of office, appointment, or employment, all records should be turned over to his/her successor. In the event that there is no successor, such as when an agency ceases to exist by an act of the General Assembly, all records should be transferred to the Library of Virginia per *Code of Virginia* § 42.1-88.

Legal Authority

In addition to the VPRA, the following statutes relate to public records management:

- [Freedom of Information Act](#) § 2.2-3700 et seq.
- [Government Data Collection and Dissemination Practices Act](#) § 2.2-3800 et seq.
- [Copies of Originals as Evidence](#) § 8.01-391

CHAPTER 2: FILES MANAGEMENT

Files management is the process of determining how files will be arranged, categorized, accessed, and stored in all formats. The file plan is at the core of a records management program and should be implemented to support and document the creation of, access to, and disposal of an agency, locality, or regional entity's records.

A good file plan provides:

- A "history" of how and why records series were created
- Systematic and cost-effective records storage and retrieval
- Easy identification of records for disposal
- Control of records with special security or access requirements
- Reduced or eliminated recordkeeping redundancy

Designing a File Plan

A good file plan will provide an overview of all records kept by a particular agency or a specific department, division, or office. In addition to paper files, the file plan must address electronic recordkeeping systems and electronic documents stored on network drives. Involving users early in the design process will allow plan implementation to run smoothly. All file plans should be accompanied by policies and procedures that are widely disseminated and training that is scheduled on a regular basis.

Additional considerations when designing a file plan:

- Simplicity – align your plan with current and easily recognizable business processes
- Consistency – provide clear instructions and procedures for the classification of records
- Flexibility – allow for the inclusion of new files and records series in the future

Filing Practices

Filing practices must be applicable across all formats as much as is possible. If an office maintains both paper and electronic systems, it does not make sense for a single records series to have two different filing schemes.

The most common methods of arranging documents are alphabetical, numerical, or alphanumeric. The file arrangement should be based on how the records will be retrieved and the cutoff specified in the records retention and disposition schedule for that particular series.

Alphabetical Filing

There are two types of alphabetical filing.

Topical filing arranges files in straight alphabetical order, such as subject correspondence arranged from A to Z, based on the name of the subject.

Classified filing arranges related documents under a major subheading, such as customer-complaint correspondence filed under the general heading of customer relations.

Advantages of alphabetical filing:

- Avoids the need for an index
- Simple filing and easy browsing

Disadvantages of alphabetical filing:

- Increased risk of misfiling
- Retrieval problems due to name changes
- Increased inefficiency with large systems
- Ease with which unauthorized persons can locate records

Numerical Filing

Numerical filing by file number, Social Security number, date, or patient or case number is common.

Advantages of numerical filing include:

- Quicker comprehension of numerical sequences over alphabetical
- Ability to add new files without disturbing existing arrangement
- Easy identification of misfiled or out-of-sequence numbers

Disadvantages of numerical filing are:

- Necessity of an index since it is an indirect arrangement
- Possibility of transposing numbers when files are created

Alphanumeric Filing

An alphanumeric arrangement uses a combination of numeric digits and letters to create a flexible filing system. An index is required to use the system effectively.

Subjects may be substituted by using alphabetical or numerical codes, such as ADM-001 (Administrative Files, Director's Correspondence) and ADM-002 (Administrative Files, Assistant Director's correspondence).

Advantages of alphanumeric filing:

- Eliminates the need for long titles
- Use of code system increases file security

Disadvantages of alphanumeric filing:

- Necessity of an index
- Must train users on how to use the codes and index

Network Drives

Files on network drives must be managed according to established filing schemes just like paper records.

Logical folder hierarchies and appropriate naming conventions for electronic files must be established and used consistently. Creating folders based on series found on the records retention and disposition schedules will assist with file retrieval and disposal.

Filing Cutoffs

The file cutoff is a break or stop in the filing of a current records series, based on a predetermined date or event. To simplify storage and purging, filing schemes should be chosen based on which type of cutoff is stated on the Library of Virginia-approved records retention and disposition schedule.

Date Cutoffs are specified dates after which a new group of file folders is created for the same series. The file cutoff date keeps records relating to the same time frame together. Many state agencies and localities use the end of the fiscal or calendar year as a cutoff date. Colleges and universities may use the end of the academic year.

Event Cutoffs result in what is called continuous filing. Some files cannot be cut off by date. Instead, individual files are removed from the series after a specified event.

Indexes

An index is a listing used to determine file location. Alphanumeric and numeric systems may require an index, but alphabetical systems do not. Most indexes have headings and subheadings listed alphabetically. The heading is the main class or title of records and the subheading lists records that are derived from or related to the main heading.

Tracking Paper Files

When a paper file is retrieved, a charge-out card should be inserted in the location where the file was removed. Automated tracking systems, with the use of bar code wands, can expedite the check-in and check-out process for large filing systems, and can generate reports that show what files were requested and by whom.

CHAPTER 3: RECORDS EMERGENCY PLANNING

Responsibilities for Planning

It is the responsibility of each agency, locality, or regional entity to develop a records emergency plan, traditionally known as a disaster plan, to use in the event of a disaster or other emergency situation. Records emergencies do not always rise to the level of “disasters,” and are not always weather-related. They can range from leaking pipes or a small mold outbreak to a hurricane or building-wide fire—anything that would result in an interruption of business processes or in the structural instability of the facility. An agency-wide Continuity of Operations Plan (COOP) alone is not enough, however. It must be accompanied by a Records Emergency Action Plan (REAP) that is devoted to the protection and recovery of all records. Where a COOP and a REAP overlap is in the protection of an agency’s essential records. Further guidance on developing this umbrella approach to records protection is provided below.

Continuity of Operations Plan (COOP)

The federal government and the Commonwealth of Virginia both use an emergency preparedness tool known as a [Continuity of Operations Plan \(COOP\)](#). [Executive Order 41 \(2011\)](#), as amended by [Executive Order 50 \(2012\)](#), requires each state agency to implement a COOP to assist in handling disasters and emergencies. The Virginia Department of Emergency Management (VDEM) is tasked with providing information and tools for plan preparation and execution. Resources for local and regional entities are also available on the VDEM site. It is vital for records officers and coordinators to know whether their agency has a working COOP in place and which officials in their agency are responsible for producing the plan. COOPs contain some, but not all, of the same information needed in a Records Emergency Action Plan, so working with COOP coordinators can greatly reduce redundancy.

Identifying and Protecting Essential Records

A critical component of both a COOP and a REAP is an essential records template. Essential records are the records that an agency needs in order to fulfill its mission-critical functions. Much like an individual needs certain records to prove his or her identity or to conduct business, government offices also have records that are necessary to operate and to provide essential services. Public interest could be adversely affected by unplanned expenditures, lost revenue, lost information and efficiency, and disruption of operation, all of which can increase the potential for litigation. Essential records are an office’s active files, and can include personnel records, payrolls, and active contracts. While some records, such as board minutes, are historically significant, they may not be considered essential or necessary for business continuity or to provide services to citizens.

Essential records are best protected through duplication and/or off-site storage. Duplication of information entails photocopying, scanning, or microfilming information that may be needed to reestablish operations after a records emergency. Duplicate records should be stored away from the office, in another building, or out of the geographical area while remaining accessible in a timely manner. If you choose to store your essential records in the same building your office occupies, extra precaution should be taken to protect them. If an essential record is in an electronic format, then the hardware or software used to create the record also needs to be protected or arrangements must be made to obtain compatible hardware and software in the event of a records emergency.

For additional guidance on creating a template for identifying essential records and the means by which to mitigate the risks to them, complete the [Essential Records Online Course](#).

Creating a Records Emergency Action Plan (REAP)

The purpose of a REAP is to protect against loss of and damage to records, facilities, and systems and to provide continued delivery of critical and essential functions and services. Effectively implementing a sound plan will allow for the quick resumption of operations, and will enhance personnel awareness of safety and risk. Developing and practicing a REAP reduces the possibility that personnel will feel overwhelmed or unprepared in the event that a disaster occurs. The REAP should:

- Identify and list contact information for all personnel, commercial disaster recovery vendors, and emergency services.
- Include instructions for minor and major weather-related disasters that may affect your geographic area as well as man-made issues such as leaking pipes, arson, or structural instability.
- Prioritize records to be salvaged first, starting with those that are essential to continuing operations.
- Be disseminated and practiced with appropriate personnel on a regular basis.
- Be reviewed and updated yearly.

To assist in the creation of a REAP, the Library of Virginia provides online access to the [Intergovernmental Preparedness for Essential Records \(IPER\) Project](#). The self-led IPER coursework is designed to help prepare state, local, and regional entities to protect records in all formats before, during, and after disasters and other emergencies. The first part of the course focuses on identification of essential records and the strategies for their protection, while the second part covers the knowledge and skills needed to protect, mitigate damage to, and recover records in the event of an emergency. Those who complete the coursework will be prepared to develop, analyze, and test a REAP for their agency, office, or department. The development of a REAP is critical to continuity of operations planning.

Off-site Storage

For information on storing nonpermanent records at the State Records Center, refer to Chapter 11 of this manual. Information on storing security microfilm of permanent records with Imaging Services at the Library of Virginia can be found in Chapter 13 of this manual.

CHAPTER 4: RECORDS RETENTION AND DISPOSITION SCHEDULES

Records retention and disposition schedules, also called “retention schedules” or “schedules,” are the Library of Virginia–approved documents listing descriptions of records grouped by common function, the length of time they must be kept, and the required method of destruction. Retention schedules reflect the length of time that records have historical, administrative, legal, or fiscal value.

Establishing a retention schedule requires appraising the use and value of information, as well as researching regulations that may govern retention. The Virginia Public Records Act (VPRA) authorizes the Library of Virginia, through the Records Analysis Section (RAS), to produce retention schedules that govern the records of all state agencies, localities, and regional entities. The creation and updating of retention schedules is done in conjunction with records creators, records officers, and appropriate staff.

Retention schedules are not merely suggestions. Records cannot be destroyed before the stated period, nor can they be retained longer than the stated period unless they are involved in an investigation, litigation, audit, or request for records pursuant to the [Virginia Freedom of Information Act](#). For records created after July 1, 2006, Virginia law *requires* the destruction of records once the retention period has expired. Government agencies must follow schedules or risk being in violation of the *Code of Virginia* § 42.1-86.1. A retention schedule establishes a systematic method of controlling a record from its creation to its final disposition.

Implementing records retention and disposition schedules is the most important part of a records management plan. Retention schedules should be reviewed regularly to ensure that they remain complete and accurate. Questions and concerns about retention schedules should be directed to RAS staff.

Benefits of a Retention Schedule

By implementing a retention schedule, an agency or locality:

- Ensures that it is in compliance with the Virginia Public Records Act (VPRA)
- Verifies that records needed for legal, fiscal, or administrative purposes will not be destroyed prematurely
- Allows records that are no longer useful to be destroyed legally
- Reduces the space and equipment necessary for filing records in paper or electronic format, thus saving money
- Determines when records may be destroyed, transferred to inactive storage, or transferred to permanent storage
- Makes sound and logical reformatting decisions more easily
- Provides information for an essential records protection plan
- Ensures the preservation of records with historical value
- Demonstrates understanding of the privacy status of a given records series

Creating and Updating General Schedules

General schedules (GS) describe records that state agencies and political subdivisions have in common, within each level of government, such as fiscal, administrative, and personnel records. Most agency and locality records will be covered under the general schedules.

General schedules are created and revised through the work of a focus group. RAS staff will call for focus group volunteers on the [Virginia Records Officer Listserv \(VA-ROL\)](#). The focus group, led by the assigned Library of Virginia records analyst, is responsible for reviewing the current schedule, if one exists, and noting any needed changes, additions, and deletions. If creating a new schedule, the focus group is responsible for researching

current needs and offering new series for inclusion. Changes and additions are negotiated as necessary and inserted into subsequent drafts. A general schedule review may take several months and require multiple meetings as well as between-meeting e-mail exchanges among the group. Participants are also expected to have between-meeting conversations with staff in their office in order to come prepared to answer questions and engage in a meaningful conversation about the schedule at each focus group meeting.

A final draft of the schedule will be made available for wider review on VA-ROL before it is submitted for approval. General schedules are reviewed on a regular basis and all updates are announced on VA-ROL.

Creating and Updating Specific Schedules

A specific schedule applies to records that are unique to a particular state agency's operations and mission. The agency-specific schedules identify records that the agency produces, collects, receives, or retains in carrying out its special functions. Localities do not require specific schedules, since records types created in one locality may also be created in any other locality.

A [Records Survey \(RM-19 Form\)](#) is used to gather information on individual records series that should be listed on an agency-specific schedule. The RM-19 Form is also used when making changes to an existing series on a specific schedule. The agency is responsible for submitting the RM-19 Form for review by the assigned records analyst. Once the records analyst has composed a draft retention schedule using the information gathered from the RM-19 Forms, the agency will review the schedule for accuracy.

Agencies should review their specific schedules regularly. A schedule that is more than 10 years old generally does not accurately reflect current business operations. Review retention schedules annually and submit suggestions for changes to existing series and the creation of new series to the assigned records management analyst.

Making the Schedule Legal

After the records analyst completes or revises a retention schedule with assistance from the focus group (general schedules) or the submitter of the RM-19 Forms (specific schedules), it is reviewed by Library staff members through the Pre-Records Oversight Committee process (Pre-ROC).

Once the draft schedule is edited, pre-approved, and any resulting questions are answered, the final draft is put before the Records Oversight Committee (ROC) at the Library of Virginia. ROC is made up of the State Archivist and records management analysts, as well as processing and public service archivists. Records officers with a vested interest in any schedule being presented at ROC are encouraged to attend.

If the draft schedule is approved by ROC, the schedule will need to be signed by the necessary officials. General schedules must be signed by the State Archivist. Specific schedules must be signed by the agency head, the respective agency records officer, and the State Archivist. Once the appropriate signatures are obtained, the schedule becomes active and is the legal documentation for the retention and disposition of records.

Submission Deadlines and Calendar

1. Draft schedules to Pre-ROC (pre-approval process).
 - Due mid-day on the Monday that occurs three (3) weeks and three (3) days prior to the scheduled ROC meeting
2. Pre-ROC members will provide their comments.
 - Due by mid-day of the Thursday of that same week

3. Analysts will address the comments/questions with assistance from focus group members or the individual submitting the RM-19 Form.
 - Due by Wednesday of the following week
4. If needed, Pre-ROC meeting is scheduled.
 - Will be scheduled for the Tuesday morning one (1) week and two (2) days before each ROC meeting.
 - During the Pre-ROC meeting, if a majority of the Pre-ROC members determine that a draft is not ready to proceed to ROC, the draft will be returned to the analyst for further development and resubmission in a subsequent ROC cycle.
5. By end of the Pre-ROC meeting day (Tuesday), analysts will complete the drafts for presentation to ROC.
6. ROC meets the second Thursday of every even month.
7. If the schedule is approved, the analyst will inform VA-ROL (for general schedules) or the agency (for specific schedules).

| MONDAY | TUESDAY | WEDNESDAY | THURSDAY | FRIDAY |
|--|---|---|---|--------|
| Analyst sends draft schedule for pre-approval (Pre-ROC). | | | Pre-ROC members return edits/questions to analysts by mid-day. | |
| | | Analysts return completed drafts to Pre- ROC by end of day. | Pre-ROC meeting (scheduled for Tues. next) called for by end of day, if needed. | |
| | Pre-ROC meeting scheduled. Analysts post drafts to ROC folder by end of day. | | | |
| | | | Records Oversight Committee Meeting | |

Composition and Appearance of the Schedules

A retention schedule includes the following:

- Signature of the State Archivist, indicating that the schedule is authorized
- Records officer and agency head signatures (specific retention schedules only)
- Schedule number
- Date effective

- Schedule title (general schedules only)
- Name of organization (specific schedules only)
- Name of department and sub-department, if appropriate (specific schedules only)
- Records series title
- Description of the contents of each records series
- Retention period and cutoff event for each records series
- Legal citations regarding retention requirements, if appropriate
- Method of records disposal or preservation for each records series

Currently, there are two schedule formats in use. The new format schedule separates the retention and disposition statements, while the old format combines them. An effort to convert all schedules to the new format is underway. All old format general and specific schedule updates must comply with the new format. No piecemeal updates of old-format schedules will occur.

Applying Retention Schedules

Always ensure that you are using the most recent version of the correct [records retention and disposition schedule](#). Retention schedules are updated on a regular basis. Printing and filing a retention schedule for future reference will often result in the use of obsolete and incorrect information. The online versions available on the Library's website are the official, up-to-date copies of the retention schedules and must be used when preparing records for destruction. Whenever possible, classify your records under an appropriate records series at the time of creation or filing.

Use the searchable databases for [locality general schedules](#) and [state general schedules](#) to assist in locating records series. When using the databases, refer back to the schedule with the correct series number for the most accurate series description and retention information.

CHAPTER 5: RECORDS INVENTORY AND RECORDS SURVEY

In order to establish an effective and comprehensive records management program, it is important to have a complete picture of all of the records to be managed and to ensure that all records are included on a records retention and disposition schedule. This can be accomplished through two data collection tools, the Records Locator Inventory (RM-20 Form) and the Records Survey (RM-19 Form).

Records Inventory

The purpose of a records inventory or comprehensive survey is to identify and quantify all records created or maintained by your agency. The [Records Locator Inventory \(RM-20 Form\)](#) is used to collect information about your records including type, date range, format, volume, storage location, and applicable schedule and series numbers. The RM-20 Form should be used to inventory all documents, both records and nonrecords, regardless of format or location.

The inventory is not intended to be an individual folder or document-item list, but rather an examination of groups of similar or related records referred to as a records series. Staff familiar with the creation and maintenance of the records should complete the inventory form in conjunction with the designated records officer. The information gathered during the inventory process will assist in the creation of records management policies and procedures, in the compilation of a list of essential records, and in the identification of any records not currently covered by an existing retention and disposition schedule. The RM-20 Form is available in both Word and Excel versions, the latter of which may be easily sorted.

Records Survey (RM-19 Form) for State Agencies

State agencies create specific retention schedules to cover records that only their agency produces, collects, receives, or maintains. During a records inventory, state agencies may identify records unique to their agency that are not currently covered by an existing general or agency-specific retention schedule.

In order to create, update, or revise a specific records retention and disposition schedule, a state agency must complete a [Records Survey \(RM-19 Form\)](#) that identifies and describes each series of public records it creates and maintains. The RM-19 Form is used to identify the purpose, function, contents, and format(s) of each series. In completing the form, records officers will also identify whether these are essential records, any restrictions on access, applicable laws and regulations, and a file cutoff event, as well as provide recommendations for retention and disposition.

Approaching the Records Survey Process

Records officers should contact their assigned Library of Virginia records management analyst for advice prior to starting the records survey process and be sure to use the most recent online version of the form. The form must be completed in MS Word and submitted electronically. It is highly recommended that one or two draft forms be submitted to an analyst for review and feedback before proceeding.

Records officers should complete the RM-19 Form in consultation with staff members who are familiar with the creation, maintenance, and use of the records. Alternately, staff and records coordinators may complete the forms directly with training from the records officer. Another option is to use records management contractors to visit each department, gather information about an office's function and records, and complete the survey forms themselves, but these services can be costly.

For more information on the scheduling process, see Chapter 4 (Records Retention and Disposition Schedules).

Evaluating Records for the Records Survey

The retention period for records is based on the value of the information. When evaluating a records series to determine retention, consider the length of time records must be kept for administrative, fiscal, legal, and regulatory requirements, as well as historical purposes.

Retention considerations include:

Administrative value

These records are necessary for the day-to-day operations of an office, to conduct current or future business functions, or to document the establishment of policy or operations. Examples include correspondence, studies, and reports.

Fiscal value

These records document an office's fiscal responsibilities, such as the receipt, payment, transfer, adjustment, or encumbrance of public funds. Most financial records usually lose value once an audit has been approved. Certain series may be governed by regulations beyond an audit, however, such as federal rules or contract language. Examples include invoices, receipts, and purchase orders.

Legal value

These records have a mandated retention by statute or regulation. Determine the legal value of records with assistance from legal counsel. Examples include leases, deeds, student records, medical records, and court case files.

Historic value

While only a small percentage of the volume of records in an organization have permanent value, those that do are especially significant as they document the history of the government or community; contain important information about persons, places, or events; or are valuable because of age or rarity, such as records of the 18th and 19th centuries. Examples include minutes, policies, agency histories, ordinances, land records, and annual reports.

CHAPTER 6: **ELECTRONIC RECORDS**

Although electronic records pose their own unique challenges, digital public records must be scheduled, maintained, and disposed of just like paper records. According to the Virginia Public Records Act (VPRA) § 42.1-85, an agency must:

ensur[e] that its public records are preserved, maintained, and accessible throughout their lifecycle, including converting and migrating electronic records as often as necessary so that information is not lost due to hardware, software, or media obsolescence or deterioration.

Each agency must ensure that it is able to find, open, and read all files over the lifetime of the record. Policies, practices, and systems for the management of electronic records must be fully integrated into existing records management programs. This chapter provides guidance on managing electronic records throughout their life cycle by using standard naming conventions and metadata, open file formats where possible, appropriate storage media, and current migration and conversion methodologies.

Storage Media

Storage media consist of the physical components on which data is stored. To determine which storage medium is best, start by analyzing the current and projected volume of stored records, along with any associated metadata. Also take into consideration data access and security requirements.

Online storage

Records are available for immediate access and retrieval, and this option provides for the fastest access and regular integrity checks. Online storage devices include mainframe storage and online servers.

Off-line storage

Records are stored on removable media such as magnetic tape or individual optical disks. Because human intervention is necessary, this option provides the slowest access.

Nearline storage

Records are stored on media such as optical disks in jukeboxes or tapes in automated libraries or using specialized server arrangements such as Storage Area Networks (SAN) or Networked Attached Storage (NAS). Nearline storage provides faster data access than off-line storage at a lower cost than online storage.

The Library of Virginia recommends online or nearline storage options for vital, long-term, or archival records. Public records should not be kept on desktop computers. All public records should be on network drives that are routinely backed up. The advantages of online and nearline storage include large storage capacities and the opportunity for data replication.

Off-line storage devices are not recommended for record copies of essential, long-term, or archival records, as they are less likely to be routinely accessed and are often overlooked when systems are upgraded and electronic records are migrated to new formats. Off-line storage is a recommended approach for backups or security copies, as the records can be stored off-site.

All storage media have finite life spans that are dependent on a number of factors, including manufacturing quality, age and condition before recording, handling, maintenance, frequency of access, and storage conditions. Before purchasing storage, evaluate the following:

- **Cost:** Consider not only the initial monetary outlay, but also the costs associated with maintaining the media as well as converting and migrating stored records.
- **Expansion:** Media should accommodate not only the current storage needs, but allow for substantial growth.
- **Longevity:** Evaluate the media life span to determine how often migration/conversion will be necessary.
- **Speed of access:** Some types of records require quick access, while others do not.
- **Stability:** Assess the potential for damage and rate of expected deterioration.

File Formats

The longevity of a file format is of primary concern. Using an untried or unproved file format that may quickly become obsolete may result in the need to convert or migrate records earlier than anticipated.

The software in which a file is created usually has a default format, often indicated by a file name suffix or extension. Proprietary file formats, such as PDF, WMV, and DOC are controlled and supported by just one software developer. Preservation of records in proprietary file formats depends on the longevity of the software used to create and store the records. Open file formats are supported by more than one developer and can be readily accessed by various software systems, and, as such, are the preferred method for long-term preservation and use of electronic records.

Examples include:

- **ASCII:** American Standard Code for Information Interchange captures data but loses structure.
- **RTF:** Rich-Text Format is ASCII with additional functionality that retains structure. It is a Microsoft format but is compatible with several word-processing programs.
- **PDF:** Portable Document Format “is a file format for representing documents in a manner independent of the application software, hardware, and operating system used to create them and of the output device on which they are to be displayed or printed.” It was created by Adobe, Inc., but became an open standard in 2008, published by the International Organization for Standardization as ISO 32000-1:2008. (Adobe Systems Incorporated, PDF Reference, Sixth edition, version 1.23, Nov 2006, p. 33.)
- **PDF/A:** Portable Document Format for Archiving is a file format based on PDF that “provides a mechanism for representing electronic documents in a manner that preserves their visual appearance over time, independent of the tools and systems used for creating, storing or rendering the files.” (ISO 19005-1)
- **XML:** eXtensible Markup Language is a standard for word-processing documents, presentations, and spreadsheets that can be implemented by multiple applications on multiple platforms. (ISO 29500)

File format decisions may affect electronic records management in the following ways:

- **Accessibility:** Find and view the appropriate record.
- **Longevity:** Supportable throughout the record’s entire retention period. Using formats not supported long-term by the developer may result in inaccessible records.
- **Flexibility:** Meet objectives for sharing and using records immediately and over the entire length of the retention period.

File Naming

Consistently named files are easier to find and identify than those that are randomly named. Therefore, it is important to establish an agency- or department-wide file-naming policy that complements the organization’s electronic records management strategy. A good file-naming convention system is descriptive, unique, uses

standardized language, and is understandable over time to others besides the creator. Allow for expansion of naming conventions to accommodate the growth of records. When numbering files, it is important to use “placeholder” digits that anticipate future growth; i.e., *01* instead of just *1* accommodates the ability to sort correctly from 1 through 99.

Select naming criteria that is most pertinent to the organization, such as:

- Version number
- Date of creation
- Name of creator
- Description of content
- Name of group associated with the record
- Project number

As an example, a chapter of the Virginia Public Records Management Manual may be saved as Ch7_ElectronicRecords_Ver3_JonesP.doc indicating the chapter number and title, the version, and the author.

Metadata

According to the [National Information Standards Organization \(NISO\)](#), “Metadata is structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use, or manage an information resource.” Metadata is useful for organizing data appropriately and finding data using relevant criteria. It also aids in preserving data by tracking the history of an object, detailing its characteristics, and documenting its function to re-create it on future technology.

NISO identifies three main types of metadata:

- **Descriptive** metadata allows for basic identification of a record through title, author, and keywords.
- **Structural** metadata indicates how objects are put together, for example, how pages are ordered to form chapters.
- **Administrative** metadata includes technical information to help manage a document, such as file type, creation date, format, and access restrictions.

Metadata may be stored within a digital object or in a separate database. Storing metadata within the digital object ensures that it will not be lost and that it will be updated along with the document. It also removes the need to link between the document and a separate metadata storage file. Not all digital objects allow metadata to be embedded, however. In such cases it is necessary to create a means to store the metadata separately. This will allow for easier manageability, search, and retrieval of metadata. A link must then be created between the digital object and the metadata storage system.

Good metadata has a structured format and a controlled vocabulary. A structured format ensures that the same metadata is created and ordered consistently for each object. For instance, an organization collecting metadata about purchase orders may choose to identify the order number, goods ordered, date of order, and amount spent for each record. A controlled and consistent vocabulary, such as that used in the [Dublin Core Metadata Initiative](#), clarifies the metadata collected. In the purchase order example, \$500.00 for filing cabinets is more descriptive than “expensive office supplies” or “big drawers.”

Migration and Conversion

The most common approach to preserving electronic records involves a combination of two techniques: migration and conversion. Migration is the process of moving files to new media (also known as “refreshing”) or computer platforms in order to maintain value. Conversion entails changing files from one format to another and may

involve moving from a proprietary format to a nonproprietary one. To avoid losing data and metadata, perform a test migration or conversion to determine the viability of continuing the process. When properly planned and executed, the migration and conversion approach probably represents the easiest and most cost-effective way to preserve electronic records.

There are three basic types of loss that may occur during conversion or migration:

- **Data:** Loss of data jeopardizes the reliability, accuracy, and integrity of the record.
- **Appearance:** Loss of structure or layout may be detrimental to understanding the record.
- **Relationships:** Loss of connecting metadata, spreadsheet cell formulas, or database tables may affect the ability to understand the data as a whole.

E-mail Management

E-mail messages—both sent and received—that contain evidence of a government transaction are considered public records and are subject to the same legal requirements regarding access as any other government records. Some examples of e-mail content that are considered public records are policies and directives; correspondence pertaining to the organization’s business; work schedules and assignments; documents circulated for approval or comment; and any message that initiates, authorizes, or completes a business transaction, final report, or recommendation. Some examples of e-mail content that are not considered public records are personal messages or announcements, courtesy or reference copies, phone message reminders, routine chat on e-mail listservs, and announcements of social events.

E-mail is not a record series. It is a format or manner of delivering content. The content of an e-mail determines the retention requirements. E-mail is usually, but not always, considered correspondence.

If you have determined that an e-mail is something other than correspondence, review the appropriate retention schedule to determine the applicable retention period. Just as with all other public records, e-mail must be maintained and accessible throughout the life span of the record.

Because individual employees have direct control over the creation and distribution of e-mail messages, it is important to provide training for all employees on e-mail procedures, including how to identify and manage e-mail messages that constitute public records.

The Library of Virginia’s [E-mail Management Guidelines](#) provide additional direction on making decisions regarding the best methods for maintaining and managing e-mail.

Website Management

Websites contain records that document government activity and the use of taxpayer dollars, just as paper records do. A trustworthy website includes not only the content pages but also information about the website that relates to the context in which it was created and used. Specific contextual information varies depending on the business, legal, and regulatory requirements of the business activity. Structural information about the organization of the website supports its long-term integrity.

Organizations may preserve Web-content records by producing a stand-alone copy or snapshot of all content pages on the site at a particular time and accompanying this snapshot with a site map that shows the relationship or directory structure of those pages to each other. A snapshot captures a website as it existed at a particular point in time (e.g., by harvesting, exporting to an image format, or simple device backup). As outlined in the [State Government Website Collection Guideline](#), the Library of Virginia currently harvests snapshots of many state agency websites.

Consider the following as you develop your Web-content management policy:

- **Determination of records:** As you develop your policy, you will need to analyze the content of your website to determine which elements constitute public records.
- **Complete records:** When you capture the record, you must preserve the appropriate content, context, and structure.
- **Records series and records retention and disposition schedules:** As with other records, follow records retention and disposition schedules established by the Library.
- **Version control:** Because websites are updated frequently by various individuals and groups, you should develop a method for designating and controlling versions. This practice will help ensure the trustworthiness of your website content.

When the information presented on a website is maintained elsewhere, such as a document that is kept on network drives and also shared on the Web, the online version is considered a copy. Many agencies may find that the information presented on their website is entirely redundant of information presented elsewhere and that there is no need to capture and maintain the site.

CHAPTER 7: REFORMATTING RECORDS

Reformatting from paper to another medium is often viewed as a means of saving space and increasing access, but it may not be the most effective or least expensive solution to a record-keeping problem. Before implementing a reformatting plan, ensure that all records past their retention period, as well as all unnecessary non-records, have been destroyed according to retention schedules, and explore alternatives such as using a records center for storage.

When to Reformat

Records should not be reformatted solely for space-saving purposes. An analysis of the records should be completed before any final decision is made. Consider the necessity and practicality of reformatting records that:

- Are historic or otherwise valuable and in bad physical condition
- Have a long retention period
- Have a high retrieval rate
- Are needed by multiple users simultaneously
- Are needed at multiple locations
- Have important research value
- Are oversized and bulky
- Need to be stored separately for security reasons
- Incorporate daily business processes

Reformatting Options

The most common reformatting options are microfilming and electronic imaging. Each option has advantages and disadvantages depending on the application and anticipated use of the records.

Microform

Microform, including microfilm and microfiche, is a reliable storage format for records with a long-term or permanent retention and low level of access. It requires that an indexing and quality control system be developed. The Library of Virginia establishes microfilming standards that are disseminated through the *Virginia Administrative Code* ([17VAC15-20-10 et seq.](#)) and the [Guidelines for Microfilming Public Records](#).

Computer Output Microfilm (COM) is a conversion of electronic information to microfilm. COM is one option for those with significant volumes of electronic data requiring long-term storage. The Library of Virginia establishes COM standards that are disseminated through the *Virginia Administrative Code* ([17VAC15-50-10 et seq.](#)).

Advantages:

- Reduces need for physical space
- Reduces wear and tear on originals
- Recommended for long-term preservation
- Does not require computer software or hardware to view
- Standards have been established

Disadvantages:

- Encounters user resistance

- Image quality degenerates in copying
- Limited to minimal access points
- Reader machines are expensive and large
- Does not allow for full-text searching

Paper

Photocopying records provides access copies while eliminating excessive handling of originals. Photocopies will need to be reproduced over time, however, and too much photocopying degrades the original.

Advantages:

- Reduces wear and tear on originals
- Does not require special technology aside from photocopier
- Inexpensive

Disadvantages:

- Increases need for physical space
- Excessive deterioration of original
- Results in image degradation

Electronic

It is legal to reformat records to an electronic format, but any technical drawings and blueprints should be reproducible to scale. Saving records electronically requires that an organization be able to find, open, and read a record over the full length of its retention period. This requires that indexing, quality control, and migration systems/plans be developed.

Advantages:

- Reduces need for physical space
- Reduces wear and tear on originals
- Facilitates indexing, searching, and retrieval
- Allows for multiple access points
- Recreates high-quality user copies with minimal image degradation

Disadvantages

- Requires software or hardware to access
- Requires continuous monitoring and eventual or periodic migration and conversion
- Faces software and hardware obsolescence
- Necessitates time-consuming metadata creation
- Requires expensive equipment to create and maintain
- Standards are not universally accepted
- Modification or corruption are potential authentication issues

Legality of Reformatted Records

Both the *Code of Virginia* (§ 8.01-391) and federal laws recognize the legal status of copies made from various sources, including electronic data. The law of evidence allows accurate and authenticated copies produced from originals to be admissible as evidence.

Authenticated records require written policies and procedures that formally document their recording, storage, or reproduction. A list of users and their access privileges should be maintained and audited regularly. Also, keep audit trails documenting who scanned or edited images and when this occurred.

Destroying Originals after Reformatting

After records are reformatted, inspected, and approved according to established standards, the [originals may be destroyed](#), unless specifically prohibited by law, because they are then considered copies. The reformatted version would then be considered the official copy of record. The best practice is to document, through written procedures, the point at which this version becomes the record. A Certificate of Records Destruction (RM-3 Form) is not created for the destruction of copies or other non-records. However, any original records with permanent retention or records created before 1913 must be offered in writing to the Library of Virginia before destruction of the originals. Also, any non-records that contain privacy-protected or confidential information must also be confidentially destroyed, even though the destruction is not to be reported.

CHAPTER 8: RECORDS DESTRUCTION

Destruction of public records is highly regulated and must be documented and reported to the Library of Virginia as stipulated in the *Code of Virginia* § 42.1-86.1. A [Certificate of Records Destruction \(RM-3 Form\)](#) must be filled out and submitted to the Library. The Library will retain the submitted original RM-3 Form for 50 years. All records that have not been deemed permanent will eventually need to be destroyed. The records retention and disposition schedules, whether general or specific, identify when a set or series of records has reached the end of its usefulness. A retention schedule will also state whether records are to be destroyed in a confidential manner. Retention schedules constitute a legal plan for the destruction of records from which state and local agencies must not deviate. Records may not be destroyed solely because of lack of space or funding for storage. An RM-3 Form is required only when destroying public records that are the **copy of record**. A copy of record is the official copy for reference and/or preservation. It may be an original or a reformatted version, but it must be designated as the copy of record. The destruction of materials that are not public records, such as copies, personal items, or reference material, must not be reported on an RM-3 Form.

A streamlined and systematic destruction program can be accomplished by setting a regular schedule for destruction, such as monthly, quarterly, semi-annually, or annually. You may also consider using the end of the calendar year, fiscal year, federal fiscal year, or school year as part of the destruction schedule. Storing records in yearly groups based on the series cutoff event can eliminate the need to weed individual folders from boxes or cabinets.

Destruction and Reformatting

After records are reformatted, inspected, and approved according to established standards or guidelines, the [originals may be destroyed](#) because they are then considered copies. The reformatted version becomes the official copy of a record. The Library does not require a [Certificate of Records Destruction \(RM-3 Form\)](#) for copies. However, any original records with permanent retention or [records created before 1912](#) should be offered in writing to the Library prior to destruction of the originals. When the reformatted records have reached the end of the retention period, an RM-3 Form must be submitted documenting the destruction.

Destruction Hold

The exceptions to destroying records in accordance with a retention schedule occur when the records are subject to audit, pending or active litigation, investigations, or request for records pursuant to the [Virginia Freedom of Information Act](#). If records are placed on hold, the retention period does not change. When the hold is lifted, the retention period picks up as if the hold never occurred. Therefore, if a retention period expired while a record was on hold, the record should be destroyed immediately after the hold is lifted.

Destruction holds may also occur during schedule reviews and updates. Once the newest schedule has been approved and is active, the destruction process remains the same.

Governmental agencies that retain and dispose of records created on or after July 1, 2006, must follow the schedules or risk being in violation of the *Code of Virginia* § 42.1-86.1 (C). The code states that records must be destroyed in a “timely manner,” which the Library construes to be one calendar year from the end of the retention period. Records containing privacy-protected information must be destroyed within six months of the end of the retention period.

Determining Date of Destruction

Ensure that you are using the most recent version of the correct [records retention and disposition schedule](#). Retention schedules change and are updated on a regular basis. Printing and filing a retention schedule for future reference will often result in the use of obsolete and incorrect information. The online versions available on the Library's website are the official, up-to-date retention schedules and must be used when preparing records for destruction.

Tips for calculating destruction dates:

- Do not count the year in which the record was created.
- Begin counting retention years with the year following the year of creation.
- Count up through the stated number of retention years as outlined on the appropriate retention schedule.
- Retain records for the full year of the final year of retention.
- Destroy records at the beginning of the next yearly cycle.

| | YEAR CREATED | RETENTION TIME | RETENTION COUNT | DESTRUCTION DATE |
|--|--------------|----------------|---|------------------|
| CALENDAR YEAR | 1986 | 10 YEARS | 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996 | 1/1/1997 |
| FISCAL YEAR 7/1/1999–6/30/2000 | FY2000 | 3 YEARS | FY2001 (7/1/2000–6/30/2001), FY2002 (7/1/2001–6/30/2002), FY2003 (7/1/2002–6/30/2003) | 7/1/2003 |
| FEDERAL FISCAL YEAR 10/1/2006–9/30/2007 | FFY2007 | 2 YEARS | FFY2008 (10/1/2007–9/30/2008), FFY2009 (10/1/2008–9/30/2009) | 10/1/2009 |
| SCHOOL YEAR 9/1/2008–8/31/2009 | SY2009 | 1 YEAR | SY2010 (9/1/2009–8/31/2010) | 9/1/2010 |

Destruction Process

The following steps document compliance with legal requirements for destroying public records:

1. Refer to a Library-approved retention and disposition schedule. Records may not be destroyed if they are not listed on any retention schedule. If a series is not represented on a schedule, contact the Records Analysis Section (RAS) for more guidance.
2. Ensure that the retention period stated on the schedule has passed. When calculating the destruction date, refer to the last date in the range of files. The year of creation must not be counted in the calculation of years to be retained.
3. Destroy records in accordance with the filing method. Records filed by calendar, fiscal, or academic year should be destroyed at the end of a calendar, fiscal, or academic year.

4. Ensure that all known audits, investigations, Freedom of Information Act (FOIA) requests, schedule-update negotiations, and litigation activities are resolved.
5. Complete a [Certificate of Records Destruction \(RM-3 Form\)](#) in the Word version found on the Records Management “Forms” webpage. Volume of records should be reported in cubic footage or bytes, such as megabytes (MB). To estimate cubic footage, refer to the [Volume Estimation Table](#).
6. Obtain the signatures necessary to authorize the destruction of the records, and then destroy the records per the destruction method indicated on the retention schedule.
7. The RM-3 Form is finalized by the signature of the person affirming the destruction of the records. If the records are destroyed off-site by a commercial vendor, then have the vendor or someone in the agency who can affirm destruction sign line 9 of the form. This must be an individual. A company name alone cannot be used in lieu of an actual person and his or her signature. Keep any notification of destruction/receipt from the vendor with the agency's copy of the RM-3 Form.
8. Once the records have been destroyed, make a copy of the completed RM-3 Form, send the *original* to the address in the top left corner of the form, and retain the *copy* according to the appropriate series on [GS-19](#) (for localities) or [GS-101](#) (for state agencies).

Methods of Destruction

The nature of the information and the format of the records dictate the method by which they should be destroyed. When records contain identifying information, as defined in [§ 18.2-186.3 \(C\)](#), or proprietary information, they must be destroyed in order to prevent unauthorized access. Records containing confidential information must be destroyed in compliance with No. 8 on the records retention and disposition schedule cover page, which calls for the “confidential destruction” of privacy-protected records.

Confidential or ultimate destruction of paper records is accomplished through shredding, pulping, or burning; for electronic records, confidential destruction is accomplished through electronic shredding, overwriting the hard drive's free space, or magnetic-media degaussing. Records that do not contain identifying information may be destroyed by placing paper documents in a trash or recycling bin, or by simply deleting electronic data. If records that have reached the end of their retention period contain Social Security numbers (SSNs), then their destruction must be in compliance with Chapter 120 of the Virginia Administrative Code ([17VAC15-120-10-30](#)). Guidance on this regulation may be found [here](#).

Importance of Documenting Records Destruction

A completed RM-3 Form serves as evidence of proper disposal when records are subpoenaed as evidence, audited, or investigated. By properly documenting the disposal of records and submitting the original signed form to RAS, the integrity of an agency or locality's records management program is protected.

A copy of the RM-3 Form must be retained by the submitting agency in accordance with the applicable schedule. The Library retains the submitted form with original signatures for 50 years. The 50-year retention is meant to help agencies and localities back up claims of legal destruction and to serve as proof of an ongoing, systematically implemented records management program.

CHAPTER 9: RECORDS PRESERVATION

Preservation is the act of stabilizing storage environments and records in order to ensure the continued existence, accessibility, and authenticity of the records over time. Preservation should not be confused with conservation or restoration, which involves the repair or stabilization of an item through chemical or physical treatment to ensure its continued existence in its original format or form. The following are general recommendations and guidelines for preservation. Specific needs may be better addressed by a professional records preservation consultant.

Key factors in preserving records include safety, security, stability of temperature and humidity levels, fire detection and suppression, and disaster prevention. A site survey is recommended for any area that houses or may house long-term or permanent records.

Maintaining a stable environment is important since fluctuations in temperature and humidity pose more of a threat to records than steady, but less-than-ideal temperatures. Stable temperatures around 68° F and a relative humidity of 35 to 50 percent are acceptable for storage areas that must house records in both paper and electronic formats.

Smoke detectors, fire alarms connected to a 24-hour monitoring station, and appropriate fire-suppression systems provide a good line of defense against records destruction by fire. A well-trained staff and close communication with fire department personnel enhance fire safety.

Avoid storing records in attics and basements where they may be susceptible to water leaks, pests, and sunlight or ultraviolet rays. Care should be taken in the placement of permanent records for safety and access. The “Storage Boxes and Shelving” guidelines found in Chapter 10 (Records Storage) are applicable for preserving permanent records. Permanent, historic, and essential records have special storage considerations. Ideally, these records are stored in a secure fire-rated vault or, if appropriate, in the Archives at the Library of Virginia.

Consider the following when creating, handling, and storing permanent records:

- Records should be created using acid-free, alkaline-buffered paper and should be stored or housed in acid-free folders and boxes. Buffering paper neutralizes acidity.
- Never use adhesive tape to repair archival or permanent records. It deteriorates over time, and the adhesive discolors and darkens the paper to which it was attached.
- Use only rustproof paper clips.
- Remove all other fasteners, such as rubber bands, grommets, and staples.
- Because folds and creases can weaken paper, unfold materials and arrange for flat storage. To avoid further damage, do not unfold fragile documents that have been folded for many years. Consult with a paper conservator for guidance.
- Papers with a high level of acidity, such as newspapers, should be reformatted to preserve the information.

Photographs are among the most engaging historical records, but they can present unique challenges. Photographs are physically and chemically more complex than paper materials. To extend the life of photographs:

- Hold prints and negatives by the edges in order to avoid touching the emulsion surface.
- Avoid using tape, metal clips, rubber bands, or adhesives.
- Avoid using ballpoint and felt-tip pens for identification purposes. Instead, use a soft pencil on the back of mat pictures with acid- and lignin-free materials.
- Color will not last, so copy important photographs in black and white.

- Framing can be destructive to photographs if done incorrectly. High-quality frame shops should know the standards and procedures recommended for framing.

Bound volumes, such as books, are composed of a variety of materials and can require complex preservation measures. Regular handling and improper storage also causes harm. To slow down the deterioration process:

- Make sure that space is available between volumes. Crowding can cause damage, especially during retrieval.
- Hold the book on either side of the spine to pull it off the shelf. Do not hook a finger over the top of the spine and pull.
- Use flat bookmarks. Never leave a bookmark in a volume permanently.
- Avoid placing heavy items in or on a volume.
- Avoid using metal paper clips, holding a volume together with rubber bands, and turning down the edges of pages.
- Do not use a volume as a surface for writing.
- Photocopying volumes is discouraged, but if a volume can withstand photocopying, do not press the spine against the copier.

If a record is maintained in an electronic format, then conversion and migration of the data may be necessary to maintain the record through its full retention period. Long-term storage of records held in electronic formats presents numerous challenges. Bear in mind that electronic media stored in a vault does not have the same heat tolerance as paper.

Consider the following when storing records in an electronic format:

- Media life span depends on factors such as storage conditions and daily use. Avoid excessive use and handling as well as storage spaces that lack proper climate control.
- Media begin deteriorating from the date of manufacture, not the date of recording. Do not buy large quantities of media. Buy it only as needed.
- Consider the maintenance of hardware devices that allow access to the data. Even under the best of conditions, hardware becomes obsolete, parts are difficult to locate, and service for the equipment becomes limited.
- Software may be superseded or become obsolete, at which point it may no longer be supported by the developer. Plan to upgrade and migrate data as necessary.

CHAPTER 10: RECORDS STORAGE

Records management personnel must be mindful of maintaining proper storage conditions and creating procedures for the storage and use of records in every stage of their life cycle.

Environmental and Security Concerns

Storage areas should conform to certain environmental and security conditions. Ideal environmental conditions include specific temperature and humidity limits and the presence of appropriate fire suppression systems. Environmental factors are described in the “Environmental Conditions” section of Chapter 9 (Records Preservation).

Records should be stored, whenever practical, in a secure area with controlled and documented access for personnel. Security is especially important for the storage of confidential or privacy-protected records. The same security considerations should be given to the storage and use of electronic records as well.

Storage System Integrity

An efficient record storage system will include written procedures for storing, retrieving, using, and refiling records. Specific procedures should also be created if a program or index is used to track records. Training should be provided to personnel to ensure compliance with all procedures. Use checkout controls for records removed from the storage area to ensure accurate tracking and proper refiling. Periodically review the storage program as needs may change over time.

Storage Boxes and Shelving

Storage boxes should:

- Be uniform in size.
- Have double walls/bottoms so they can be safely stacked and reused.
- Be made of acid-free material if storing permanent/long-term records. Less expensive non-acid-free storage boxes can be used for nonpermanent records storage.

Shelving units should:

- Be sized to ensure that the weight of the loaded shelves does not exceed the floor-load capacity.
- Be sturdy enough to hold boxes loaded with as much as 50 pounds.
- Have bottom shelves at least three inches off the floor to help prevent damage from flooding.
- Provide sufficient space for the boxes to be pulled off the shelves easily.
- Be anchored to the floor where possible.
- Ideally, be placed so that they do not touch any walls, but especially outside walls.
- Be accessible by a sturdy and size-appropriate ladder, as needed.

Packing and Stacking Boxes

Pack records properly so that they can be safely and efficiently placed on shelves. When packing and stacking boxes:

- Keep records in the original file folders when placing in boxes unless the records are permanent. Permanent records should be placed in acid-free folders and boxes.
- Do not pack boxes tightly, since this could impede file removal. Allow for up to an inch of space to remain in the box after packing.

- Consider larger records and materials such as maps and drawings that will have special handling, packing, and shelving needs.
- Place infrequently accessed records on the top or bottom shelves.
- Neither records nor boxes should be in contact with a wall or floor.

Centralized Storage Facility

If a series of records is referenced more than once per month, it is generally considered active. Active records should be kept within, or in close proximity to, the office. Records that are used less frequently are considered inactive and are eligible for off-site or centralized storage. If storing inactive records with either a commercial service provider or the State Records Center is not feasible, then government entities need to identify a reliable, secure, and lower-cost area to store these records in-house. Maintaining a centralized records storage facility encourages efficient operations by saving valuable office space and combining departmental resources. Creation or use of a centralized records storage facility should be endorsed by the agency or locality's governing official or body, and written procedures should be clearly communicated to staff.

CHAPTER 11: STATE RECORDS CENTER TRANSFERS AND SERVICES

The [State Records Center](#) (SRC) houses inactive, nonpermanent paper, microform, and electronic media for any government entity of the commonwealth in a secure and environmentally stable location. The records held at the SRC remain the property of, and access is restricted to, the entity of origin.

The SRC facility also houses [Imaging Services](#), which manages a security microform program, and the Archives Annex, which holds low-reference permanent records. There is also a reading room for viewing archival materials.

Eligibility for State Records Center Storage

Records that have not yet reached the end of their retention period but are rarely referenced are ideal candidates for storage in the SRC. Transferring records to the SRC frees up space in an office for more useful purposes. Often it is more economical to pay for off-site storage than it is to buy more file cabinets and pay office real estate prices.

The format of a record is considered in the short-term and long-term storage and accessibility of the information. Formats of records eligible for SRC storage include paper; microforms including microfiche, computer output microfiche (COM), and 16mm and 35mm reels; and electronic, including CD/DVD, hard drives, and magnetic media.

Electronic records stored on portable media within records center boxes may be transferred to the SRC; however, the SRC is responsible for maintaining only the conditions in which the media is stored, not the media itself or the data contained on the media.

All records to be transferred must be listed on an approved general or specific records retention and disposition schedule. The SRC will not accept any records that:

- Are not on a records retention and disposition schedule
- Have reached the end of their retention period
- Are within six (6) months of reaching the end of their retention period
- Do not belong to an agency of the commonwealth
- Are permanent
- Have an open-ended retention period, such as “destroy after no longer administratively useful.”

Access and Ownership

Each agency retains ownership of its records while they are stored at the SRC. Access to the records is strictly controlled so that no individual, agency, or office may access records without specific authorization from the record owner. State Records Center staff members will only access records at the request of the owner and are required to sign a confidentiality agreement treating all information as classified. The confidentiality agreement also bars staff members from disclosing information in the records to unauthorized individuals.

Storage Fees and Service Charges

There is a monthly fee for storage of records at the SRC. This fee applies for any unit of records stored for any portion of the month, and includes accessioning, refiling, and removal of boxes from shelves at the end of the retention period. [Additional fees](#) apply for storage of odd-size records units, shredding, copying, emergency retrievals, and out-of-service-area pickups.

Transfer Procedures for Nonpermanent Records

1. Identify the appropriate schedule and series number. Records must be listed on an approved retention schedule, with a finite disposal date, to be eligible for transfer to and storage at the SRC.
2. Determine the volume of records. To prepare for packing and determine the correct number of boxes needed, estimate the cubic footage to be transferred. Refer to the [Volume Estimation Table](#) or simply approximate how many files will fit into a cubic-foot box (also known as a records center box, 15" x 12" x 10").
3. Order boxes. Boxes sent to the State Records Center for file storage must be letter/legal size, heavy duty, 200-lb. test corrugated double-wall construction (at the minimum), with three-ply ends, removable top, and die-cut handholds cut into each end. Boxes must be interlocking with no staples or tape required for set up. Boxes must be able to hold 50 pounds. Boxes should be one cubic-foot size, with 15" x 12" x 10" internal dimensions.
4. Pack the boxes. Carefully pack boxes so that files and materials can be easily removed and replaced, leaving about one inch of free space. Materials must fit in the box without causing it to bulge, and lids must fit correctly. Do not place records in hanging file folders within the box and do not send damaged boxes, such as those that are crushed or have ripped handles. Boxes should weigh about 30 pounds or less. Files should be placed in the box in neat, logical order, as if they were in a file drawer. File names or numbers must be visible.
5. Enter box information into Infolinx (the Library's records management software program). All State Records Center customers must have [Infolinx](#) login credentials in order to transfer boxes. In order to receive login credentials, submit a [Records Officer Designation and Responsibilities \(RM-25 Form\)](#).
6. Label and bar code the boxes. Bar code numbers are automatically assigned to boxes created in Infolinx, and those numbers are added to a label queue. Those labels should be printed on Avery 5523 2" x 4" weatherproof shipping labels. Apply the bar code labels to a 12" side of the box, in the bottom left-hand corner, approximately 1" from the bottom and 1" from the left side.
7. Request a pickup of boxes. Notify SRC staff by e-mail that boxes are ready for transfer. In the content of the e-mail, be sure to include the total number of boxes, the physical location of the boxes, including the floor and room number where boxes are located, and your complete contact information. An SRC staff member will call or e-mail to arrange for a records pickup.
8. Assemble records for pickup. Only boxes entered into Infolinx will be picked up by SRC staff. Agencies and localities outside the Richmond service area may contact the SRC for a records-pickup service quote or to arrange to have the records delivered to the SRC. All records pickups or deliveries must be scheduled.



Requesting Records

All boxes in storage at the SRC are searchable via Infolinx. In order to request an individual file, rather than the entire box, the file information must be entered into Infolinx along with the box information. After identifying the correct box or file, submit a request by completing and faxing the [Records Center Retrieval Request \(RM-18 Form\)](#) to 804.236.3722. RM-18 Forms must be completed using a computer or typewriter.

Returning Records

Call the SRC when ready to return records to the facility. Records will be picked up and promptly returned to the appropriate place in the SRC. Customers outside the Richmond service area may use a preferred delivery company to return the records.

Destruction of Records at the SRC

Records stored at the SRC will not be destroyed without the agency's written permission. When records are eligible for destruction, the SRC will send a list of the boxes to be destroyed and the [Certificate of Records Destruction \(RM-3 Form\)](#) identifying the volume of records and method of disposal to the records officer for signature. After return of the signed RM-3 Form to the SRC, the records will be destroyed, and then a copy of the completed RM-3 Form will be forwarded to the agency.

SRC customers can identify boxes of records that are eligible or past due for destruction by logging into Infolinx and following these step-by-step [instructions](#).

The method of destruction depends on criteria laid out in the records retention and disposition schedule. Those that are deemed confidential, private, or sensitive will be shredded for a [fee](#) by the SRC to ensure that the information is protected. Records not requiring confidential destruction are either picked up by a paper recycler or sent to a landfill. Any records may be confidentially destroyed by request of the records owner.

Confidential and nonconfidential records destruction services are also available for government offices not using the SRC's storage services. The agency is responsible for filling out the RM-3 Form and then contacting the SRC to pick up the records. After destruction is completed, a signed copy of the RM-3 Form will be returned to the records officer.

Pest Eradication and Blast Freezing

Occasionally, records stored in poor conditions require the eradication of pests from the materials. The SRC's pest eradication chamber is a custom-built blast freezer that freezes records at -40° F in order to destroy insects and vermin. The records then are gradually brought back to room temperature.

The chamber can also be used in an emergency to stabilize water-damaged records and stop the growth of mold until document restoration professionals can provide specialized treatment. The maximum load for emergency stabilization is 600 cubic feet of records. It is important to freeze water-damaged records within the first 48 to 72 hours to avoid an outbreak of mold. For help with a records emergency, contact either the SRC at 804.236.3705 or your [records management analyst](#). After-hours emergency contact information is available on the Library of Virginia's [website](#).

CHAPTER 12: ARCHIVAL TRANSFER PROCEDURES

Virginia public records with enduring administrative, fiscal, historical, or legal value are considered permanent. Permanent disposition is indicated on the records retention and disposition schedules as either “Permanent, In Agency” or “Permanent, Archives.”

Records with a disposition of “Permanent, Archives” may be transferred to the Archives at the Library of Virginia, where they will be permanently preserved and made accessible to researchers. Review appropriate general and specific records retention and disposition schedules to identify permanent records and determine which records are eligible for transfer to the Archives. Specific transfer procedures for boxing, labeling, and listing contents must be followed and archival records should be transferred on a regular basis to avoid large accumulations. Records officers should contact their assigned records analyst before beginning a transfer.

Caring for Archival Records during their Active Life Cycle

Prior to their eventual transfer to the Archives, permanent records require proper care and attention while used and stored in the agency or locality. Records should be clearly marked as permanent and be stored in secure areas with appropriate environmental conditions. For paper records, file names should be written directly on folders, rather than on adhesive labels, as these labels often fall off over time. In keeping with preservation-maintenance practices, records should be printed on acid-free paper and kept in acid-free folders.

Preparing Records for Transfer

Use the [Volume Estimation Table](#) to determine the number of boxes needed for your paper and/or microform transfer. With electronic records, determine the number of compact disks or the size of the external drive needed for records transfers. The feasibility of transferring archival electronic records must be discussed with the assigned [records management analyst](#) in advance.

Paper records being transferred to the Archives require standard acid-free boxes (15” x 12” x 10”). This one-cubic-foot-size box will hold 14 inches of letter-size files or 11 inches of legal-size files. Boxes must be heavy duty, 200-lb. test corrugated double-wall construction (at the minimum), with three-ply ends, removable top, and die-cut handholds cut into each end. Boxes must be interlocking with no staples or tape required for set up. Contact your [records management analyst](#) before preparing to transfer records that are odd-sized, such as maps or plats, or are in non-paper formats.

Pack files into boxes and/or save electronic records to external electronic media in the same order and hierarchy in which they are currently stored. Maintaining the original order of the files is an underlying principle of archival management and will accurately reflect the actual administrative use of the records.

When boxing permanent paper records:

- Pack files in acid-free boxes with different records series boxed separately.
- Place files upright in the box in the same logical order in which they were kept in the file drawer.
- Make sure file names or numbers are visible.
- Avoid over packing or under packing boxes to prevent damage to records. Carefully pack boxes so that files and materials can be easily removed and replaced, leaving about one inch of free space. Materials must fit without causing the box to bulge, and the lid must shut completely.

- Do not send damaged boxes, such as those that are crushed or have ripped handles or water damage.
- Boxes should weigh 30 pounds or less.

The Library of Virginia handles a large amount of archival material, so it is crucial that the exterior of all boxes and containers be properly labeled.

When labeling:

- Do not put the label on the box lid.
- Label each box on the 12-inch side, or on the front of the CD, and include:
 - Name of the agency or locality
 - Administrative subdivision, if applicable
 - Records series title and dates
 - The range of contents, including the name or number of the first and last files
 - Box or CD number
- Handwrite the label information directly on the box or electronic record container. Do not use adhesive labels or affix forms to the box.
- Number the boxes or electronic record containers consecutively for each transfer. Do not duplicate box numbers within a single records transfer.

Boxing and labeling requirements for archival microforms are found in Chapter 13 (Microform Transfer Procedures).

Archival Transfer Forms

Once the records have been boxed (or saved, for electronic records) and labeled, complete an [Archival Transfer List and Receipt \(ARC-1 Form\)](#) in the Microsoft Word version as provided on the website. The ARC-1 Form provides a notice of intent to transfer, a receipt, and a descriptive list of boxes, compact disks, or USB drives to be transferred.

After filling out the ARC-1 Form, complete an [Archival Transfer Folder List \(ARC-2 Form\)](#), also in the provided Microsoft Word form. The ARC-2 Form is a separate and distinct document from the ARC-1 Form, which lists only the beginning and ending files in each box or compact disk. The ARC-2 Form is a detailed listing that accurately describes each folder in each box or on the external media. This form will act as a finding aid or guide, allowing for intellectual control of and access to the records.

After completing both the ARC-1 and ARC-2 forms, send a copy of the forms in the Microsoft Word version to your assigned [records management analyst](#) for review and approval. Both forms must be completed and submitted together before a transfer will be scheduled. The analyst will return the approved versions. Keep copies of both forms to document the transfer.

Physical Transfer

After the transfer request is approved and the approved forms returned to the records officer, a Library staff member will arrange to pick up the records. The original, signed ARC-1 Form must be provided at the time of the records pickup. After the transfer is complete, a copy of the ARC-1 Form that includes a unique accession number assigned by Archives staff will be provided to the records officer. Permanently retain the returned ARC-1 Form with the copy of the ARC-2 Form, because the accession number on the ARC-1 form will be the easiest way to locate the records whenever they may be needed.

Accessing Records in the Archives

Unless restricted by law, public records housed in the Archives are available through the Library of Virginia reading rooms. Once state records have been transferred to the Archives for permanent retention they cannot be returned to the agency. To access records that have been transferred to the Archives, contact Archives Reference Services at 804.692.3888.

CHAPTER 13: MICROFORM TRANSFER PROCEDURES

The [Imaging Services Section](#) (ISS) at the Library of Virginia manages a microform-preservation program for the Library's collection, as well as for permanent records of state agencies and political subdivisions. This program is offered free of charge for all permanent records stored on microforms, as well as for microform backups of permanent records. Nonpermanent records converted to microfilm are stored through the State Records Center for a fee. ISS also offers advice on microform reformatting and storage to any government entity in accordance with the Virginia Public Records Act. Security microforms stored through this program are not used for reference purposes. Paper records at the Library of Virginia are not available for public use once they have been reformatted.

Caring for Microform Records

As part of a good record-keeping routine, microforms of permanent records should receive proper care and attention prior to their transfer to Imaging Services. They should be clearly labeled and kept in an orderly manner in clean and safe storage areas with appropriate environmental conditions. In keeping with preservation maintenance practices, these microforms should be stored in acid- and lignin-free microfilm boxes and individual microfiche envelopes.

Preparing to Transfer Microforms

In order to capture the most secure and accurate information about the records being transferred, follow Imaging Services' [Microfilm Storage Guidelines](#). Transfers not meeting these requirements will be returned to the records custodian for correction or additional information.

- 1. Review retention schedules**

Find the appropriate general and specific records retention and disposition schedule and locate the series for the records on microform. The schedule will indicate which records series have been listed for permanent retention and are eligible or required to be transferred to Imaging Services.

- 2. Order boxes and microfiche envelopes**

All microfilm sent to the Library for storage must be placed in acid- and lignin-free boxes. This helps to ensure stable, long-term storage of the film. For microfiche, use acid- and lignin-free envelopes and fiche boxes. The Library will not accept containers that do not meet these [requirements](#).

- 3. Pack boxes**

Insert the microfiche into an individual acid- and lignin-free envelope by records series, volume/file number, and fiche number. Arrange and pack reels into boxes by records series, volume/file number, and reel number.

- 4. Label microfilm boxes**

It is crucial that the exterior of all boxes be properly labeled to ensure that they are easily accessible. The minimum labeling required on a microfilm box must meet the requirements found in the [guidelines](#).

- 5. Transfer lists and receipts**

- Archival records**

If the microforms that are being transferred contain permanent, archival records to be transferred to the Library of Virginia's Archives as noted in the appropriate records retention and disposition

schedule, they should be transferred following the normal procedures using the [Archival Transfer List and Receipt \(ARC-1 Form\)](#). Refer to Chapter 12 (Archival Transfer Procedures) for additional information.

- **Permanent (non-archival) records**

If the microforms are backup copies of permanent records being retained in the agency, then the [Archival Microform Transfer List and Receipt \(ARC-3 Form\)](#) must be used. That form, completed in the Microsoft Word version provided on the website, must be e-mailed to your assigned records analyst for review prior to the transfer. After the agency has received the approved ARC-3 Form back from the analyst, the printed, signed form must be sent to Imaging Services with the transfer. A copy of the final ARC-3 Form will be provided to the records custodian after the microforms are inspected for adherence to the established standards and guidelines.

6. **Physical transfer of microforms**

There are several options for transferring microforms. If the microforms are part of a transfer of records going into the Library's Archives, the transfer logistics will be worked out with State Records Center personnel. If the microforms are a backup of an agency's permanent records, then the media should be transferred directly to Imaging Services, and can be sent by United Parcel Service, Federal Express, or any other courier service that provides shipment tracking and receipt. It can also be hand-delivered to the Library or scheduled for pickup by State Records Center personnel, if within SRC's normal delivery area. Consult with your assigned analyst for details.

CHAPTER 14: THE ROLE OF ARCHIVES, RECORDS, AND COLLECTION MANAGEMENT SERVICES AT THE LIBRARY OF VIRGINIA

Under the guidance of the State Archivist and in accordance with the [Virginia Public Records Act](#), the Library of Virginia's Archives, Records, and Collection Management Services (ARCS) division supports the effective and economical management of state agency and political subdivision records.

Records Analysis Section (RAS)

[Records management analysts](#) are available to provide government offices with consulting services for establishing and maintaining effective public records management programs. Analysts assist with managing records throughout their life cycle by developing retention schedules, addressing reformatting and preservation issues, and determining the proper methods of disposition for confidential and privacy-protected records.

RAS provides:

- Advice on implementing public records management programs.
- Training on records management topics, presented regionally and on-site.
- Records management guidelines, standards, and manuals.
- [Records retention and disposition schedules](#) for all public records, regardless of format.
- Assistance with records emergency planning through the [Intergovernmental Preparedness for Essential Records \(IPER\)](#) program.
- Assistance in identifying permanent and essential records.
- Assistance in identifying and transferring archival records to the Archives at the Library of Virginia.
- Assistance in identifying and transferring nonpermanent, inactive records to the State Records Center.
- Web content including publications, forms, training videos, and links to records management resources.

Description Services

Description Services is charged with the protection and preservation of the documentary heritage of official public records of state agencies determined to have enduring value, as well as promoting research through enhanced accessibility. Description Services appraises, analyzes, arranges, and describes state agency records housed in the Archives. Accessioning archivists create and maintain the documentation for incoming records, receive and describe incoming collections, and assign records a permanent, unique accession or identification number. The division creates online catalog records and finding aids to enable access to the Archives' materials.

Local Records Services

Local Records Services is responsible for the protection and preservation of local records determined to have enduring value, with an emphasis on records created by the Commonwealth's circuit courts through the administration of the [Circuit Court Records Preservation \(CCRP\) Program](#). The CCRP Program preserves and makes accessible the documentary heritage of Virginia's circuit courts. The statewide program of assistance and grants focuses on preserving the records of Virginia's 120 circuit court clerks' offices. Funding is generated from a fee on land transactions recorded in the clerks' offices. The program initiatives include funding preservation grants and managing the storage, processing, and reformatting of records transferred to the Archives.

Imaging Services

[Imaging Services](#) manages a security microform program for the Library's collection, state agencies, and localities, and offers advice to state and local governmental agencies in accordance with the Virginia Public

Records Act. Security microforms (i.e., microfilm and microfiche) stored through this program are not used for reference purposes. Access to security microform media is restricted to the record custodian. No other agency or person may have access to it without written authorization from the record custodian.

State Records Center (SRC)

The [State Records Center](#) provides a secure and economical facility to house inactive, nonpermanent public records. Records can be housed at the SRC until their retention periods have elapsed. Ownership of the records is maintained by the agency or political subdivision while the records are housed in the SRC. Records may be accessed only by the creating organization or with specific authorization from the creating organization. Records at the SRC are kept in a stable, environmentally controlled, secure facility that has fire detection and suppression and intrusion protection systems monitored around the clock.

CHAPTER 15: CONDUCTING COMPLIANCE REVIEWS (AUDITS)

A sound records management program must have a mechanism in place for auditing compliance. Policies and procedures are worthwhile only if they are followed and staff members are held accountable.

A compliance review, or audit, is an assessment of the processes that make up a system. Audits evaluate effectiveness and compliance, as well as help minimize risk. Conducting regular compliance reviews allows a records officer to identify and monitor areas in need of improvement. A records officer should set and follow a time frame for conducting regular reviews, such as every other year, for example.

Conducting a compliance review of records systems will help:

- Ensure compliance with the agency's established directives, as well as state and federal laws and regulations
- Ensure that records will be accepted as evidence in a court of law
- Improve the agency's performance and efficiency
- Provide accountability to the citizens of the commonwealth

Establishing a Compliance Review Program

Compliance review success hinges on planning, execution, and results reporting. Successful records management audits should be highly structured, which will help ensure that:

- Responsibilities are defined
- Scope and methodology of the review are clear
- Resources are identified and available
- Disruption to services is minimized
- Findings are identified and communicated
- Necessary improvements are made

Determining Responsibility for Compliance Reviews

Responsibility for conducting compliance reviews will depend on several factors, including the type of review, the presence of external agencies with audit power, and the existence of an agency audit plan that includes assessment of records management practices.

Regardless of the type of compliance review undertaken or the entity undertaking it, it is important that the designated records officer is aware of and participates in the review.

Defining the Scope of a Compliance Review

Compliance reviews should focus on those areas where noncompliance poses the most pressing liability issues. Agencies should direct resources to areas where there are known problems. Areas of potential risk include, for example, the inability to recover essential records from a disaster in order to resume operations, and the protection and disposition of confidential records.

The scope of the review should also include which areas of the records management program will be completely reviewed and which will be reviewed using sample testing. Records destruction practices, for example, may be sample tested to reveal whether there is evidence that the requirements are generally being met. Other areas that may require more thorough examination include records storage and the safety of confidential records. Time

constraints and record volume will directly affect sample sizes and the choice between the use of sample testing and a more complete examination.

Compliance Review Components

A sound compliance review should answer the following questions:

- **Are records management responsibilities clearly documented?**

The compliance review should holistically assess the effectiveness of an agency's records management program. A successful program will have the following:

- Records officer appointed by the agency head with documentation on file with the Library.
- A records management policy that encompasses all records, regardless of format.
- Procedures for managing records at all levels of the organization.

- **Is records management education and training provided regularly?**

All individuals within an agency are responsible for managing their records and all staff should be aware of the Virginia Public Records Act (VPRA) and what constitutes a public record. Ensuring compliance across an agency requires regular training on the principles of records management using the agency's policy and procedures. The education of senior management is especially important since their support is crucial to a successful program, given their power to effect agency-wide change.

- **Is the records inventory up to date?**

At its most basic level, a records inventory identifies all records series, as well as their storage locations and format(s). All records created and maintained by the agency and their accompanying scheduled destruction dates should be noted in the inventory using the Library of Virginia–approved records retention and disposition schedules as guidance.

- **Are all of the records that are created/maintained relevant to business practices and captured using the appropriate system?**

It is important to begin managing records at their creation in order to effectively manage them throughout their life cycle. The compliance review should check that the agency's policies and procedures cover the capture, management, and secure storage of information, as well as whether those policies and procedures are being followed.

- **Are records stored properly?**

Storage facility conditions and security controls should be studied for potential risks. Current measures to protect records from water and fire damage, proper control of access, and other security threats should be evaluated.

- **Are records disposed of properly?**

The review should examine records disposal procedures and evaluate compliance with current Library-approved records retention and disposition schedules. Submission of properly completed [Certificates of Records Destruction \(RM-3 Forms\)](#) should also be reviewed.

- **Are electronic records being managed properly?**

The integrity and authenticity of records in electronic systems should be evaluated to help ensure that effective processes for accessing, maintaining, storing, and transferring electronic records are in place.

- **Are records securely managed?**

Records containing confidential information must be managed in a secure manner and disposed

of properly as required by the Virginia Public Records Act (VPRA) and other state and federal regulations. Ensuring that all records are authentic and legally admissible is fundamental to a records management program. This portion of the compliance review should focus on security controls within electronic, paper, and any other media-based systems. The compliance review should discover whether confidentiality has been breached or put at risk through the deliberate misuse of systems or because of weak, nonexistent, or poorly applied procedures.

Reporting Compliance Review Findings

Compliance review findings should be reported to the appropriate managers for action. Information learned from the compliance review, including possible better practices, should be communicated throughout the agency. Any changes made as a result of a compliance review should be clearly communicated to staff and senior management and, if necessary, incorporated into the agency's records management policy and procedures.

GLOSSARY

accession

Process of taking permanent legal and physical custody of a group of records and to formally document their receipt

accession number

Unique number or code assigned to identify a group of records acquired by the Archives at the Library of Virginia for the purpose of control and classification to link materials to the associated record

acid free

Material with a pH value of 7.0 or above, with no natural acid content, or that has had the acid content removed. May not retain alkalinity over time due to external acid absorption.

active record

Record that continues to be used with sufficient frequency to justify keeping it in the office of creation

administrative records

Records that concern the routine operation and management of any office

administrative value

Value of a record based on a continuing need for it or its usefulness for conducting business

agency

A unit of government authorized by law to perform a specific function. Any department or division of the executive, judicial, or legislative branches of state government. As used in the Virginia Public Records Act, also means local government offices, regional authorities, and all other political subdivisions.

appraisal

Process of determining the length of time records should be retained based on legal requirements and on their current and potential usefulness

archival records

Materials created or received in the conduct of affairs that are deemed by the Library of Virginia to be worthy of preservation within the State Archives because of the enduring historical value or as evidence of the roles and responsibilities of the creator

archive

To transfer records to a repository, physical or electronic, in order to preserve and provide access to those records

archives

Repository specifically designed for preservation, storage, and use of archival records

Archives, Records, and Collection Management Services (ARCS)

Division of the Library of Virginia responsible for state and local archival records, micrographics and electronic media, and records management guidance and education

archivist

Individual responsible for collecting and managing records of enduring value in order to protect their authenticity and context

backup

To create a copy of records as a safeguard against the loss or damage of the original material

centralized files

Consolidation of files from several divisions in one location

Circuit Court Records Preservation Program (CCRP)

Funded through a recordation fee, the CCRP provides grants to the Commonwealth's circuit court clerks to help preserve the historically valuable records in their courthouses and that have been transferred to the Library's Archives for safekeeping

Code of Virginia

Statutory law of the Commonwealth of Virginia consisting of the codified legislation of the Virginia General Assembly

compression

Process that reduces the amount of space necessary for electronic data to be stored or transmitted

confidential record

Records restricted from disclosure by statute, court order, or legally adopted rules and regulations

conservation

Repair or stabilization of materials through chemical or physical treatment to ensure their continued existence in their original form

continuous files

Files that are not cut off or closed on a regular basis but are purged regularly in the course of routine business

convenience copy

Nonrecord copies of documents kept solely for ease of access and reference

copy of record

The single copy of a document, often the original, which is designated as the official copy for reference and preservation

cubic foot (c.f.)

Standard measure of volume equaling 15" L x 12" W x 10" H

To determine cubic footage $\frac{L" \times W" \times H"}{1728}$

cutoff event

A point in time when a record series can be broken into a regular segment and its disposition applied to that segment

decentralized files

Records that are generated and used by a single organizational unit and maintained and controlled at the point of origin

defunct series

Record series that is no longer created or that identifies records that have been reclassified and superseded under a different series

delete

Electronic removal from memory of a file's index, not the file itself. Deleted records may remain on storage media in whole or in part until overwritten and may be restored with complete accuracy.

density

In micrographics, the relative difference between the lightest and darkest part of an image as measured by a densitometer

Description Services

Section of the Archives, Records, and Collection Management Services division of the Library of Virginia that accepts, preserves, protects, describes, and enhances accessibility of archival collections from state agencies and private entities

destruction

A disposal process that results in the obliteration of records

destruction hold

The halt of scheduled destruction of any records that are potentially relevant to litigation, investigation, or audit

digital image

Image composed of discrete pixels set in rows and columns to form a composite eye-readable format

digitized records

Records created or converted into a digital image

direct access filing

System that permits access to files without reference to an index

discovery

Legal process that compels a party in a lawsuit to disclose information or records relevant to a court case

disposition

Records' final destruction, permanent retention, or transfer to Archives as determined by their appraisal

electronic record

Data or information that is captured and fixed for storage and manipulation in an automated system and that requires the use of the system to render it intelligible by a person

essential records

Records immediately necessary to begin recovery of business after a disaster or essential to protecting the rights and interests of the organization, its employees, and the citizens of the commonwealth

filing system

Policies and procedures directing how files should be stored and indexed in order to ensure their retrieval, use, and disposition

fiscal value

Value of a record based on continuing usefulness for verifying financial information that is necessary for conducting business

fiscal year (FY)

Twelve-month period on which a budget is designed, usually not coinciding with a calendar year

folder list

List prepared by the creating office detailing the contents contained in one or more boxes, file drawers, or other storage container

format

Media that serves as a carrier of information

General Schedule (GS)

Retention and disposition schedule that applies to records that all state agencies or localities create, such as personnel, fiscal, or administrative records

Government Data Collection and Dissemination Practices Act

State law governing the collection, maintenance, use, and dissemination of personal information, formerly known as the *Privacy Protection Act of 1976*

historical value

Value of a record based on its uniqueness, age, or exceptional significance

imaging

Process of copying documents by reproducing their appearance through photography, micrographics, or scanning

Imaging Services

Library of Virginia unit responsible for support of imaging programs in the commonwealth

inactive record

Record that is no longer used in the day-to-day course of business but must be retained for a defined period based on continuing value

index

An ordered list that points to information in materials that are organized in a different order

indirect access filing

System that requires reference to an index to access materials

legal value

Value of a record based on its ability to document and protect the rights of citizens, provide defense in litigation, or demonstrate compliance with the law

Librarian of Virginia

Individual appointed by the Library Board to direct and manage the operations of the Library of Virginia

Library Board, The

Board established by the General Assembly and appointed by the governor to set collection policies; promote library science, history, and archival education; and control the state's records management function

Library of Virginia (LVA)

Reference library at the seat of government in Virginia, which also certifies libraries, distributes state and federal funds to public libraries, manages the archives of the Commonwealth, and acts as agent for the Library Board in establishing standards, policies, and procedures for the management of public records

life cycle

Distinct phases of a record's existence, from creation, to use, to maintenance, and finally disposition

listserv

Automated electronic mail distribution system designed to disseminate information to a common-use group. See also *VA-ROL*

Local Records Services

Section of the Archives, Records, and Collection Management Services division of the Library of Virginia that accepts, preserves, protects, describes, and enhances accessibility of archival collections of local government entities

locality

Any city, county, or town and its attendant departments, regional or combined authorities, and commissions or offices. See also *Political Subdivision*

machine-readable record

Record that requires a mechanical device to make it intelligible to humans

magnetic storage

Method of storing electronic information on computer drives, discs, or tapes by magnetizing particles imbedded in the material

metadata

Data describing the context, content, and structure of records and their management through time

microfiche

Approximately 4" x 6" or 3" x 5" sheet of film containing images laid out in a grid and having an eye-readable heading

microfilm

Transparent film used to capture and view highly reduced images of documents

microform

Term for any form containing microimages

nonrecord

Convenience, courtesy, or information-only copy of a record, such as a reading file or duplicate copy that is disposed of after use

optical disc

Laser-readable, plastic-coated disk used to store information digitally

overwrite

To write new electronic data on top of existing electronic data and thus erase the previously existing data

permanent record

Materials created or received in the conduct of affairs that are preserved by the creator because of the enduring historical value or as evidence of the roles and responsibilities of the creator

personal papers

Private papers related solely to an individual's own affairs

pest eradication chamber

Room or facility dedicated to destroying insects and vermin and inhibiting the growth of mold on water-damaged records

policy

Official expression of principles that direct an organization's operations

political subdivision

Administrative body created as a division of the Commonwealth of Virginia, including local governments (counties, cities, and towns), commissions, authorities, and districts

preservation

Act of stabilizing storage environments and records in order to ensure the continued existence, accessibility, and authenticity of documents over time

privacy-protected record

Record containing personally identifying information safeguarded from disclosure by the *Government Data Collection and Dissemination Practices Act*

pulping

Means of destruction whereby documents are soaked in water and then churned or chopped into a pulp

record

Any document, data, or file created or accumulated during the course of, and that provides evidence of, public business, regardless of the format in or media on which it may be contained

Records Analysis Section

Section of the Archives, Records, and Collection Management Services (ARCS) division of the Library of Virginia directly responsible for records management consultation, developing records retention and disposition schedules, providing records management training, and maintaining the records management website

records management analyst

Member of Records Analysis Section of the ARCS division of the Library of Virginia responsible for coordinating with government records officers to ensure compliance with records management policies and procedures, create schedules, and provide training

records center

Facility used for low-cost, temporary storage of inactive, nonpermanent records

records center box

Standardized storage container specifically designed to house either letter- or legal-size files on a standard shelving unit. The carton is approximately one cubic foot in volume or 15" x 12" x 10" in size.

records coordinator

Individual in an agency or locality who assists the organization or department's records officer in implementing a records management program

records custodian

Agency or locality having physical possession of and responsibility for the care and control of records

records emergency (disaster) plan

Policies, procedures, and information to direct necessary actions needed to recover from and lessen the impact of an unexpected interruption of business, whether natural or man-made

records inventory

The process of surveying the records in an office, typically at the series level

records management

The systematic control of records throughout their life cycle to ensure efficiency and economy in their creation, use, handling, control, maintenance, and disposition

records officer

Required by the *Code of Virginia*, the agency or political subdivision employee designated to monitor and control the creation, use, storage, transfer, and destruction of records

records retention and disposition schedule

Library of Virginia–approved timetable stating the length of time a record must be kept and its required disposition. Also called a *retention schedule*.

records series

Group of similar or related records that are arranged according to a file system and that are related as the result of being created, received, or used in the same activity

records series number

A six-digit number assigned to designate a specific records series

reformat

To create a copy in a different format or medium from the original, especially for preservation or access needs

refreshing records

Act of recopying or reproducing electronic information with the aim of extending the useful storage life of the information

removable media

Any portable computer storage device that can be easily removed from a computer and stored or transported separately, including, but not limited to, CDs, DVDs, flash drives, floppy disks, DAT tapes, cartridges, and Zip disks

resolution

A measure of the sharpness of an image

restricted records

Records with limits on access and use as set by code or statute

retention period

Length of time a record is held before disposal takes place

retrieval system

Any system designed to index, locate, retrieve, and deliver records for use

schedule number

Unique number assigned to identify an individual retention schedule

security microfilm

Microfilm specifically created as backup of the original records in order to protect against accidental disposal, fire, theft, or other disasters

shredding

Means of destroying paper records by mechanical cutting

Specific Schedule

Retention and disposition schedule that applies to a particular agency

State Archivist

Person appointed by the Librarian of Virginia to manage the archival collections of the Library of Virginia

State Records Center (SRC)

Building operated by the Library of Virginia that houses inactive nonarchival records, inactive archival records, a media storage vault, and the Library's Imaging Services unit

VA-ROL (Virginia Records Officer Listserv)

Electronic mailing list used by the records management analysts at the Library of Virginia as an official means of communicating information to the Commonwealth's records officers

Virginia Freedom of Information Act

State statute making state records available for public inspection minus those that are exempt based on *Code of Virginia* § 2.2-3705.1

Virginia Public Records Act (VPRA)

Code of Virginia § 42.1-76 et seq., which grants authority to the Library of Virginia to ensure uniformity in the practice of records management throughout the Commonwealth and its agencies, and political subdivisions